

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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SYMPHONY HEALTH SOLUTIONS	:	
CORPORATION, SOURCE	:	
HEALTHCARE ANALYTICS LLC, and	:	
IMPACTRX, INC.,	:	
	:	Civil Action No. 13-4290
Plaintiffs,	:	
v.	:	Hon. Gerald A. McHugh
IMS HEALTH INCORPORATED,	:	
	:	
Defendant.	:	

**FILED**  
AUG 18 2015  
MICHAEL E. KUNZ, Clerk  
By \_\_\_\_\_ Dep. Clerk

**STIPULATION AND ORDER TO STAY ALL PROCEEDINGS**

On this 18<sup>th</sup> day of August, 2015, Plaintiffs Symphony Health Solutions Corporation, Source Healthcare Analytics LLC, and ImpactRx, Inc. (collectively "Symphony Health") and Defendant IMS Health Incorporated ("IMS Health") seek to stay all proceedings in the above-captioned matter and aver as follows:

WHEREAS, Symphony Health and IMS Health are engaged in active settlement negotiations;

WHEREAS, Symphony Health and IMS Health are making good faith efforts and progress toward resolution of all pending claims and counterclaims in this litigation;

WHEREAS, Symphony Health and IMS Health seek to reduce the cost and burden of discovery and other proceedings while the parties further explore resolution of this litigation;

NOW THEREFORE, Symphony Health and IMS Health, through their undersigned counsel, hereby stipulate as follows:

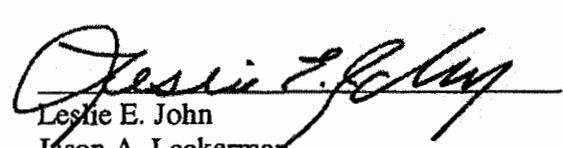
(1) The above-captioned litigation shall be stayed and the current schedule shall be suspended so that the parties can further explore settlement;

(2) Symphony Health and IMS Health shall jointly keep the Court apprised of the status of settlement negotiations, submitting a letter to the Court at least every 60 days following the date of the Court's approval of this stipulation;

(3) In the event that the parties are no longer engaged in good faith settlement negotiations, the parties shall jointly write to the Court to request that the stay be lifted and to propose a new case management schedule based on the case management schedule currently in place pursuant to the Court's July 30, 2015 Order at ECF No. 148.

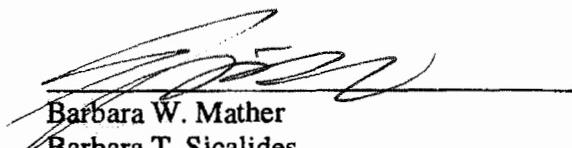
(4) To the extent the stay is lifted, neither party shall use the pendency of the stay as a reason to expand the scope or length of discovery. However, this stipulation is without

prejudice to either party's request to expand the scope or length of discovery for reasons other than the stay, including without prejudice to Symphony Health's pending request to enlarge the number of depositions (ECF No. 154).



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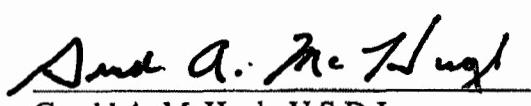


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*Attorneys for Defendant IMS Health Inc.*

SO ORDERED on the 18<sup>th</sup> day of August, 2015:



Gerald A. McHugh, U.S.D.J.

**ENTERED**

AUG 18 2015

**CLERK OF COURT**